



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

ALC/DCP/LHE/PTH
F. #2016R00505

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 16, 2019

By ECF and Email

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Re: United States v. Mark Nordlicht, et al.
Criminal Docket No. 16-640 (BMC)

Dear Counsel:

Enclosed please find the government's discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. All of the enclosed materials qualify as "Discovery Materials" under the January 23, 2017 Stipulation and Order entered in the above-captioned case, ECF Docket No. 76, and their use and dissemination are restricted as provided in that Stipulation and Order. This disclosure supplements the government's earlier disclosures by letters dated January 23, 2017, January 26, 2017, February 14, 2017, February 24, 2017, March 9, 2017, March 27, 2017, April 3, 2017, April 12, 2017, April 26, 2017, May 5, 2017, May 11, 2017, May 26, 2017, June 16, 2017, June 20, 2017, July 3, 2017, July 6, 2017, July 17, 2017, July 27, 2017, August 21, 2017, August 22, 2017, August 30, 2017, September 15, 2017, October 4, 2017, November 7, 2017, December 26, 2017, March 6, 2018 April 2, 2018, May 10, 2018, June 28, 2018, October 5, 2018, October 26, 2018, January 4, 2019, January 25, 2019, February 4, 2019, February 15, 2019, April 4, 2019, April 25, 2019 and May 6, 2019. The government again requests reciprocal discovery from the defendants.

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The discovery production made available to you on May 16, 2019 contains:

- Email correspondence sent to or from an attorney at BakerHostetler, which has been Bates numbered EDNY-PP-MISC-000027 – EDNY-PP-MISC-000103; and
- Notes produced to the government by a former Beechwood employee, which have been Bates numbered AN031141.

Very truly yours,

RICHARD P. DONOGHUE
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By: /s/
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cc: Clerk of the Court (BMC) (by ECF) (w/o enclosures)
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